

Emily Cooper OSB# 182254

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Counsel for Plaintiff, Disability Rights Oregon

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., & A.J. MADISON,**
Plaintiffs,

v.

PAT ALLEN, in his official capacity as head of
the Oregon Health Authority, & **DOLORES
MATTEUCCI**, in her official capacity as
Superintendent of the Oregon State Hospital,
Defendants.

**JAROD BOWMAN, JOSHAWN DOUGLAS-
SIMPSON,**
Plaintiffs,

v.

PAT ALLEN, in his official capacity as head of
the Oregon Health Authority, & **DOLORES
MATTEUCCI**, in her official capacity as
Superintendent of the Oregon State Hospital,
Defendants.

Case No.: 3:02-cv-00339-MO

DECLARATION OF EMILY COOPER
IN SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL MEMORANDUM

Case No. 3:21-cv-01637-MO
(Member Case)

I, Emily Cooper, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters contained herein, and am competent to testify thereto.

2. I am the Legal Director at Disability Rights Oregon ("DRO"), the designated Protection and Advocacy system for Oregon and a Plaintiff in the above captioned matter.

3. Attached as Exhibit A is a true and accurate copy of the Court's neutral expert Dr. Debra Pinals, M.D., First Report dated January 30, 2022.

4. Attached as Exhibit B is a true and accurate copy of the Court's neutral expert Dr. Debra Pinals, M.D., First Report dated June 5, 2022.

DATED this 25th day of August 2022 in Portland, Oregon.

/s/ Emily Cooper

Emily Cooper, OSB #182254
Disability Rights Oregon